

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No. 06 CR 451
)	Violations: Title 21, United States
JAMES AUSTIN, aka "Jaymo,")	Code, Sections 846, 841(a)(1), and
JOHNNY SHANNON, aka "Boo C" and)	843(b); and Title 18,
"Boosie,")	United States Code, Sections
JEROME JOHNSON, aka "Little Marcus")	2 and 922(g)
and "Wheezy,")	
ANTONIO SHANNON, aka "Montana,")	
SEAN WINN,)	
DERRICK CAMPBELL, aka "Dino,")	
TYRONE WALLACE, aka "Taz" and)	
"Juvie,")	
KEVIN WILLIAMS, aka "Nickle Bag,")	
PENORRIS BROWNRIDGE, aka)	
"Pernorris Brownridge" and "PJ,")	SUPERSEDING INDICTMENT
TASHIKA SLEDGE,)	
FRANK HARRIS, aka "Knuckles,")	
CHINUA GIPSON, aka "Chino," and)	
ARTURIO AUSTIN, aka "Lump")	
)	
)	

COUNT ONE

THE SPECIAL SEPTEMBER 2005 GRAND JURY charges:

1. At times material to the indictment, the Dearborn Homes housing project ("the DBs") was a 16-building Chicago Housing Authority (CHA) housing project located on the South Side of the City of Chicago.
2. Starting no later than in or around 1998, until in or around June 2006, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere:

JAMES AUSTIN, aka "Jaymo,"
JOHNNY SHANNON, aka "Boo C" and "Boosie,"
JEROME JOHNSON, aka "Little Marcus" and "Wheezy,"
ANTONIO SHANNON, aka "Montana,"
SEAN WINN,
DERRICK CAMPBELL, aka "Dino,"
TYRONE WALLACE, aka "Taz" and "Juvie,"
KEVIN WILLIAMS, aka "Nickle Bag,"
PENORRIS BROWNRIDGE, aka "PJ,"
TASHIKA SLEDGE,
FRANK HARRIS, aka "Knuckles,"
CHINUA GIPSON, aka "Chino," and
ARTURIO AUSTIN, aka "Lump,"

defendants herein, did conspire with each other, Larry Smith, Lynn Barksdale, Bernard Howard, Duante Falls, Antonio Stidhum, Freddie Westmoreland, and others known and unknown to the Grand Jury, knowingly and intentionally to possess with intent to distribute and to distribute controlled substances, namely, 1 kilogram or more of mixtures and substances containing a detectable amount of heroin, a Schedule I Controlled Substance, and 400 grams or more of mixtures and substances containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Narcotic Drug Controlled Substance (hereafter "fentanyl"), in violation of Title 21, United States Code, Section 841(a)(1).

2. It was further part of the conspiracy that as to

JAMES AUSTIN, aka "Jaymo,"
JOHNNY SHANNON, aka "Boo C" and "Boosie,"
JEROME JOHNSON, aka "Little Marcus" and "Wheezy,"
DERRICK CAMPBELL, aka "Dino,"
TYRONE WALLACE, aka "Taz" and "Juvie,"
KEVIN WILLIAMS, aka "Nickle Bag,"
PENORRIS BROWNRIDGE, aka "PJ,"

defendants herein, the deaths of E.G., M.V., R.F., S.W., S.B., and others resulted from the use of mixtures and substances containing a detectable amount of fentanyl distributed by the above-mentioned conspiracy, in violation of Title 21, United States Code, Section 841(a)(1)(C).

3. It was part of the conspiracy that the Mickey Cobras street gang (“the Mickey Cobras”) provided the organization that facilitated the distribution of heroin and fentanyl in the DBs. The Mickey Cobras established a system through which individuals could enter certain residential buildings in the DBs at the southern end of the DB’s that the Mickey Cobras controlled and therein purchase heroin and fentanyl from a selection of various brands, or “lines,” of heroin. The heroin and fentanyl was packaged in individual user quantities, usually sold for \$20.00, \$10.00, or \$5.00 per package, and packaged in distinctive plastic packaging. As part of the system, Mickey Cobras or their drug-trafficking associates conducted pat-downs of incoming heroin and fentanyl purchasers to ensure that such purchasers were not law enforcement officers or carrying weapons, and they would also conduct counter-surveillance to protect the heroin and fentanyl operation from detection by law enforcement.

4. It was further part of the conspiracy that JAMES AUSTIN was the leader of the Mickey Cobras in the DBs and oversaw heroin and fentanyl distribution in the DBs. Other Mickey Cobra gang members, including CHINUA GIPSON, Lynn Barksdale, ANTONIO SHANNON, and Larry Smith, also had leadership roles in the gang and assisted

in the management of narcotics distribution in the DBs. The Mickey Cobras sold various lines of heroin from locations within the DBs. With the permission of the Mickey Cobras' leadership, various Mickey Cobras ran, or "owned," the lines. Owners of the heroin lines employed other Mickey Cobras or associates to perform tasks necessary for the operation of the heroin line, such as supplying the heroin and fentanyl, mixing it with non-heroin ingredients to increase its volume and modify its composition to appeal to drug users, packaging it for sale, transporting it to locations within the DBs, selling it to individual customers, and transporting the proceeds from heroin and fentanyl sales. Defendant JAMES AUSTIN used violence and the threat of violence to control the individuals who were permitted to sell heroin and fentanyl within the DBs. Other high-ranking Mickey Cobras, including Barksdale, ANTONIO SHANNON, GIPSON, and Larry Smith, assisted JAMES AUSTIN in determining who could sell heroin and fentanyl within the DBs.

5. It was further part of the conspiracy that JAMES AUSTIN required other Mickey Cobras to pay him money, known as a "street tax," in return for his continued permission for them to sell heroin and fentanyl in the DBs. Other high-ranking Mickey Cobras, including Barksdale, ANTONIO SHANNON, GIPSON, and Larry Smith assisted in the collection of the street tax.

6. It was further part of the conspiracy that JAMES AUSTIN owned two heroin lines at times called "Reaper" and "Penicillin" at the DBs.

7. It was further part of the conspiracy that DERRICK CAMPBELL supplied wholesale quantities of heroin and fentanyl to the Mickey Cobras' heroin lines in the DBs, including lines owned by JAMES AUSTIN.

8. It was further part of the conspiracy that the following individuals assisted JAMES AUSTIN in the operation of his heroin lines at the DBs:

a. JOHNNY SHANNON, aka "Boo C" and "Boosie," who assisted JAMES AUSTIN in overseeing the day-to-day operations of JAMES AUSTIN's heroin lines,

b. KEVIN WILLIAMS, aka "Nickle Bag," who was a mixer and transporter of heroin and fentanyl for JAMES AUSTIN's heroin lines,

c. TYRONE WALLACE, aka "Taz" and "Juvie," who was at times a manager for JAMES AUSTIN's heroin lines,

d. JEROME JOHNSON, aka "Little Marcus" and "Wheezy," who was at times a manager for JAMES AUSTIN's heroin lines,

e. SEAN WINN, who worked as a seller of heroin and fentanyl and a transporter of drug proceeds on various Mickey Cobra heroin lines,

f. PENORRIS BROWNRIDGE, aka "PJ," who was a mixer of heroin and fentanyl and a manager for JAMES AUSTIN's heroin lines, and

g. ARTURIO AUSTIN, aka "Lump," who was a manager for JAMES AUSTIN's heroin lines.

9. It was further part of the conspiracy that the individuals who were permitted to own heroin lines in the DBs with the consent of the leadership of the Mickey Cobras included:

a. CHINUA GIPSON and Lynn Barksdale, who co-owned heroin lines, which heroin lines were at times called “8-Ball” and “Kingpin,”

b. Larry Smith, who owned lines of heroin, which lines were at times called “Drop Dead” and “Lethal Injection,”

c. Duante Falls, who owned a line of heroin, which line was at times called “One Stop” or “Undertaker,”

d. Bernard Howard, who owned a heroin line, which line was at times called “Renegade,”

e. Antonio Stidhum, who owned a heroin line, which lines was at times called “Dynasty,” and

f. Freddie Westmoreland, who owned heroin lines, which lines were called at various times “Stars” and “Demon.”

10. ANTONIO SHANNON, aka “Montana,” assisted Lynn Barksdale on Barksdale’s heroin lines, partnered with Barksdale on heroin lines, and served as an enforcer for JAMES AUSTIN.

11. It was further part of the conspiracy that FRANK HARRIS worked for Lynn Barksdale’s heroin line as a courier and seller.

12. It was further a part of the conspiracy that TASHIKA SLEDGE used her position as a Chicago Police Officer to assist the drug trafficking activities of her co-conspirators, including Lynn Barksdale, by, among other things, accessing Chicago Police Department electronic databases to learn information about co-conspirators and other information, to disclose this information to co-conspirators, and to otherwise provide information to co-conspirators about law enforcement activities,

13. It was further a part of the conspiracy that the defendants and other co-conspirators possessed and carried firearms, and other weapons, and used threats of violence and violence to advance the conspiracy's objectives of selling narcotics.

14. It was further part of the conspiracy that on numerous occasions during the course of the conspiracy, defendants called to or from cellular telephones to facilitate their drug distribution activities.

15. It was further part of the conspiracy that defendants and other co-conspirators concealed, misrepresented, and hid, and caused to be concealed, misrepresented, and hidden, the existence and purpose of the conspiracy and the acts done in furtherance of the conspiracy, including but not limited to the use of coded language and counter-surveillance techniques to avoid detection and apprehension by law enforcement authorities;

All in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT TWO

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about December 27, 2005, at approximately 1:17 p.m. (Call No. 8982), in the Northern District of Illinois,

DERRICK CAMPBELL, aka “Dino,”

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with the intent to distribute and to distribute controlled substances as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT THREE

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about December 27, 2005, at approximately 4:12 p.m. (Call No. 9056), in the Northern District of Illinois,

DERRICK CAMPBELL, aka “Dino,”

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with the intent to distribute and to distribute controlled substances as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT FOUR

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about December 27, 2005, at approximately 5:19 p.m. (Call No. 9080), in the Northern District of Illinois,

DERRICK CAMPBELL, aka “Dino,”

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with the intent to distribute and to distribute controlled substances as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT FIVE

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about January 3, 2006, at approximately 4:42 p.m. (Call No. 11460), in the Northern District of Illinois,

DERRICK CAMPBELL, aka “Dino,”

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with the intent to distribute and to distribute controlled substances as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT SIX

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about March 22, 2006, at approximately 9:57 p.m. (Call No. 1143), in the Northern District of Illinois,

FRANK HARRIS, aka “Knuckles,”

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with the intent to distribute and to distribute controlled substances as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT SEVEN

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about March 27, 2006, at approximately 5:39 p.m. (Call No. 1625), in the Northern District of Illinois,

FRANK HARRIS, aka “Knuckles,”

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with the intent to distribute and to distribute controlled substances as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT EIGHT

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about March 30, 2006, at approximately 6:43 p.m. (Call No. 2357), in the Northern District of Illinois,

FRANK HARRIS, aka “Knuckles,”

defendant herein, knowingly and intentionally used a communication facility, namely a telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with the intent to distribute and to distribute controlled substances as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT NINE

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about April 25, 2006 at Chicago, in the Northern District of Illinois, Eastern Division,

JAMES AUSTIN, , aka “Jaymo,”
KEVIN WILLIAMS, aka “Nickle Bag,”
PENORRIS BROWNRIDGE, aka “PJ,” and
JEROME JOHNSON, aka “Little Marcus” and “Wheezy,”

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 40 grams or more of mixtures and substances containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT TEN

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about June 21, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

JAMES AUSTIN, aka “Jaymo,”

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed a firearm, namely, a Desert Eagle .357 caliber semi-automatic handgun, Serial Number 9221A, in and affecting interstate commerce in that the firearm traveled in interstate commerce prior to defendant’s possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT ELEVEN

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

On or about April 13, 2006 at Chicago, in the Northern District of Illinois, Eastern Division,

ANTONIO SHANNON, aka “Montana,”

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed a firearm, namely, a Smith and Wesson Model SW9V nine millimeter semi-automatic handgun, Serial Number PAV1578, in and affecting interstate commerce in that the firearm had traveled in interstate commerce prior to the defendant’s possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION ONE

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

1. The allegations of Counts One of this Indictment are realleged and incorporated herein by reference for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of their violations of Title 21, United States Code, Sections 846, 843(b), and 841(a)(1), as alleged in the foregoing Indictment,

JAMES AUSTIN, aka "Jaymo,"
JOHNNY SHANNON, aka "Boo C" and "Boosie,"
JEROME JOHNSON, aka "Little Marcus" and "Wheezy,"
ANTONIO SHANNON, aka "Montana,"
SEAN WINN,
DERRICK CAMPBELL, aka "Dino,"
TYRONE WALLACE, aka "Taz" and "Juvie,"
KEVIN WILLIAMS, aka "Nickle Bag,"
PENORRIS BROWNRIDGE, aka "PJ,"
TASHIKA SLEDGE,
FRANK HARRIS, aka "Knuckles,"
CHINUA GIPSON, aka "Chino," and
ARTURIO AUSTIN, aka "Lump,"

defendants herein, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2): (1) any and all property constituting and derived from, any proceeds they obtained, directly and indirectly, as a result of the violations of Title 21, United States Code, Sections 846, 843(b), and 841(a)(1); and (2) any and all of property used, or intended to be used, in any manner or part, to commit and facilitate the commission of the violations of Title 21, United States Code, Sections 846, 843(b), and 841(a)(1).

3. The interests of the defendants subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853 include, but are not limited to, the following::

- a. \$10,000,000 in United States Currency, representing the estimated proceeds of the narcotics distribution organization;

4. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to defendants under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1);

All pursuant to Title 21, United States Code, Section 853.

FORFEITURE ALLEGATION TWO

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

1. The allegation contained in Count Ten of this Indictment are re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of his violation of Title 18, United States Code, Section 922(g)(1), as alleged in Count Ten,

JAMES AUSTIN,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section, 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest he may have in any property involved in the charged offense.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) are a Desert Eagle .357 caliber semi-automatic handgun, Serial Number 9221A, and accompanying ammunition;

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

FORFEITURE ALLEGATION THREE

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

1. The allegations contained in Count Eleven of this Indictment are re-alleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of his violation of Title 18, United States Code, Section 922(g)(1), as alleged in Count Eleven,

ANTONIO SHANNON,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section, 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest he may have in any property involved in the charged offense.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) are a Smith and Wesson Model SW9V nine millimeter semi-automatic handgun, Serial Number PAV1578, and accompanying ammunition;

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY